

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

EARL SANDERS,

Plaintiff,

v.

THE CITY OF CHICAGO, et al.,

Defendants.

No. 08 CV 03701

Judge Shadur
Magistrate Judge Brown

**MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE
PLEAD**

Defendant, City of Chicago, by and through its attorney, Myron Mackoff of the law firm Richardson & Mackoff, Ltd., move this Honorable Court to extend its time to file an answer or responsive pleading to the Complaint. In support of this motion, Plaintiff states as follows:

FACTS

1. The Complaint in this matter was filed on June 27, 2008.
2. Defendants in this matter are the City of Chicago as well as individual police officers alleged to have violated Plaintiff's constitutional rights.
3. As of the time of filing of this motion, on information and belief, Plaintiff has not yet served process on the individual police officers named as Defendants.
4. There is a strong possibility that when the individual police officers are served, they will request that the City provide them with counsel and, barring any conflicts,

Richardson and Mackoff, Ltd., will be appointed as counsel for the individual police officers as well as the City of Chicago.

5. Should there be no conflicts, there is a high likelihood that a single response to the Complaint would be sufficient for all Defendants.

6. Further, until the defendant police officers are served and obtain representation, counsel for the City's access to these co-defendants for purposes of investigating the underlying facts of the Complaint will be limited.

7. Efficiency and effectiveness would be served if this Honorable Court allows the City of Chicago additional time to answer or otherwise plead to the Complaint until such time as all defendants have been served.

8. Defendant, City of Chicago has sought the Plaintiff's agreement to this extension and Plaintiff has no objections.

WHEREFORE, for all of the foregoing reasons, Defendant, City of Chicago, prays the Court extend its time to answer or otherwise plead to the Complaint until 21 days after all defendants are served in this matter and to set the matter for status on service at the Court's convenience.

Respectfully submitted,

____/s/ Myron Mackoff____
Attorney for plaintiff

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